

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)
Modernizing the E-rate) WC Docket No. 13-184
Program for Schools and Libraries)

**COMMENTS BY Mississippi Educational Technology Leaders Association
RELATED TO THE E-RATE 2.0 NOTICE OF PROPOSED RULEMAKING**

The Mississippi Educational Technology Leaders Association (METLA) is an educational association dedicated to the improvement of Education in Mississippi through the use of technology. The organization is made up of Technology Coordinators from across Mississippi as well as others interested in K12 technology in the state. Over two thirds of the districts in the state are represented by METLA. The goals of this association are to provide for sharing and exchanging best practices, ideas, techniques, materials, and procedures for the use of technology in the K-12 educational environment, and to encourage and lobby for the increased philosophical and monetary support of technology in order to help improve the education of the youth of Mississippi. METLA provides a support network to aid its members and others in implementing and supporting technologies in their educational institutions. METLA also collaborates and supports the Mississippi Department of Education and other stakeholders in establishing and maintaining proper technology standards and procedures and identifying technology needs within the K-12 educational community.

The comments herein are from the consensus of a committee of METLA members formed to respond to this document. The general consensus of the committee is that in order to meet the proposed goals, the Commission must reduce eligible P1 services to only those necessary to provide adequate Internet broadband to schools and to restrict P2 services to providing adequate Internet broadband to the classrooms. The committee also encourages the commission to continue to require competitive procurement practices even at the expense of increasing the district's administrative work-load. Competition is necessary to foster competitive pricing. The committee discourages the Commission from providing incentives for districts to use State Master Contracts, Master State Agreements and Consortia instead of competitively bidding. Each of these has its place and pricing from each must be considered but their pricing should not be allowed to supersede the competitive procurement process that we have found in Mississippi to be so helpful in bringing down costs to the districts and to the fund.

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RESPONSE to II.A(16)

The METLA Committee agrees that the three goals are correctly listed in order of priority 1) Ensuring affordable access, 2) Maximizing cost effectiveness, and 3) Streamlining Administration. We feel that “Average bandwidth per student” and “Average Cost per student” are the two measures which will give the most consistent results across a wide variety of technologies and organization of School and District networks. In order to accomplish these measurements, data collection will have to be modified so that accurate figures can be derived and analyzed. The value “Cost per student” needs to be measured by adding the dollar amounts of Internet Access, Internet Transport, and WAN circuits and calculated using average daily District or school attendance.

RESPONSE to II.B.1(19)

The METLA Committee agrees in this period of transition and expansion, the FCC should focus only on one component, and that is Internet Access and the corresponding transport circuits. The majority of the METLA committee also agrees that if funds are available after P1 services are funded, then P2 should be limited to only to equipment necessary to get adequate bandwidth to students and teachers in the classroom with P2 service on a rotational basis so that everyone has a chance at P2 funding for those specific services.

It is, however, apparent that unless the FCC uses other funding such as Connect America funds or drastically increases E-Rate funding, to establish the fiber backbone throughout the US, districts in severely underserved areas are not going to be able to afford the services to meet the stated FCC Goals.

RESPONSE to II.B.2(20)

The majority of the METLA committee believes that Enhanced Data collection of circuit size/bandwidth/cost/enrollment would provide the basic benchmark for ensuring ample bandwidth is available per recommendations. Performance of the actual network itself should be beyond the FCC’s scope. We recognize that there are inherent differences in ISP performance so data collection should also include a “rating system” where the most consistent ISP’s are recognized and those that are performing below expectations can be put on probation

The one thing the committee completely agrees on is that Cost Per Student and Bandwidth per student must be the ONLY criteria used to determine cost and the degree to which the goals are achieved.

RESPONSE to II.B.2(21)

Entities like Education Superhighway have pushed grassroots efforts to measure schools connections, but these efforts are pointless in that a desktop bandwidth speed test does not accurately reflect the overall speed and performance of the primary circuit. The FCC should first take schools input on their speeds at face value, (i.e., we have 100 megs), and then help inform and educate them on how to accurately measure their “overall” bandwidth rather than relying on desktop speed tests. Desktop “Speed tests” do not also do well in distinguishing between consumer grade circuits and commercial circuits. A T-1 line will serve far more concurrent users than will a consumer grade connection at the same speed. Education is the answer, and then accurate data collection to reflect the relative merit of all ISP’s who sell bandwidth to E-rate customers.

There are too many factors involved to determine an accurate benchmark at the sites to compare. Need to look at direct throughput at the ISP and use strict SLAs that will cost the ISP money if not maintained.

RESPONSE to II.B.2(22)

We feel that the ConnectED proposals have omitted certain elements of the SETDA recommendations and do not specify a “per student” number which profoundly affects the expectations. We concur with the SETDA recommendations. We also recognize that these are just general numbers, as actual bandwidth per student needed also depends on what type of devices are in use (Desktops use less bandwidth than certain mobile devices), and how the school structures their instructional day. Some districts may use far less than the SETDA recommendations, some may use more. We feel that the SETDA recommendations are a good target.

The METLA Committee is split on setting a “CAP”. From an economical standpoint, caps would be good but from a perspective of providing the needed resources to teachers and students, we fear that it could be counter productive. The FCC needs to refine their priorities and act accordingly.

We all agree all aspects of the program should be revisited ANNUALLY in order to ensure that the current needs and goals are being met. This would eliminate some of the concerns our committee members have over caps.

Another concern regarding caps is that some districts may have innovative programs that require more bandwidth than others. These believe that the cap should be placed to the highest level needed for those activities

The one thing the committee agrees on completely is that any caps put in place MUST be revisited EVERY YEAR.

RESPONSE to II.B.2.(23)

The committee has no problem with the targets but we believe that the caps should be revisited annually to ensure that districts legitimately using large amounts of bandwidth are covered.

RESPONSE to II.B.2.(24)

Bandwidth needs will differ from school to school depending on devices being used and the applications being run. A 1:1 district would certainly need more bandwidth than others but the 2017 recommendation of 1 Mbps per student in a 1:1 environment would be sufficient for use with today's software applications. Some flexibility should be built into any cap to accommodate emerging technologies that may require more than a 1 Mbps per student.

In Mississippi, there are only 5 districts that currently meet the 100 Mbps per 1000 students. With one exception, the districts that meet the criteria are not using the State Master Contract. Those using the master contract are not even close. No school district in the state, including the 1:1 districts meet the 1 gig per 1000 at this time.

RESPONSE to II.B.2.(26)

The METLA committee agrees that you have to look at the SETDA recommendations as a ratio between bandwidth and users, not a set number. By virtue of their being extremely remote, they are going to have a much smaller population, and therefore much smaller bandwidth need.

RESPONSE to II.B.2.(27)

The METLA committee believes that the FCC should confine your initial priorities to getting the bandwidth to the schools to begin with then focus the attention on the P2 components necessary to get the bandwidth to the students.

The majority of the METLA committee also agrees that if funds are available after P1 services are funded, then P2 should be limited to only to equipment necessary to get adequate bandwidth to students and teachers in the classroom with P2 service on a rotational basis so that everyone has a chance at P2 funding for those specific services.

RESPONSE to II.B.2.(28)

The METLA committee agrees that performance measurements should be left up to the ISP's and the School/District IT department. The FCC involvement should be limited to recommending high quality connections such as Fiber Optic, and keeping a database of reported problems with ISP's

Available bandwidth will solve a multitude of latency issues. FCC involvement should be kept to a minimum.

RESPONSE to II.B.2.(29)

The majority of the METLA committee agrees that the Cost per Circuit and Speeds purchased should be collected and published by the FCC to display "adoption".

RESPONSE to II.B.2.(30)

The METLA committee is 100% in agreement that the two units of measurement for this proposal must be Cost Per Student and Bandwidth Per Student. The necessary information to make these two determinations must be included in the FCC Form 471

RESPONSE to II.B.2.(31)

The majority of the METLA committee agrees that specific information should be provided and should be publicly available. No specific mechanisms are needed, just enable the Form 471 information to be searchable on the SLD website with their search tools.

RESPONSE to II.B.2.(33)

The METLA committee agrees that most networks can measure the bandwidth that has traveled across their edge, and report this regularly. Even networks without any performance tools can do this, provided they have access to their edge device and can show interfaces. Comparing apples to apples with actual traffic transmitted and received would show the differences in usage. Taking a measurement of what that usage actually was is an onerous chore and should be discouraged.

The FCC should not be complicating our worlds with more paperwork. We think there should some availability for help if needed, but our monitoring should suffice for documentation on usage.

RESPONSE to II.B.2.(34)

The METLA Committee agrees that there should be no requirement to have additional equipment. Most well performing networks will have such equipment already in place. Networks without these assets can obtain that information from their ISP. We do agree that a monthly report of circuit size, bandwidth, and usage should be required by the FCC as part of the documentation for E-rate.

Please don't... this will only contribute to duplication and waste. Schools can provide this information now.

RESPONSE to II.B.2.(35)

The total amount of data you are talking about collecting is staggering, but it is not impossible. Schools/Districts with something like Nagios could send all their collected data to a central database, but to do this on a nationwide scale would be very expensive on the collection side.

The METLA committee agrees if there is a central database created to collect the data from school districts, we would be willing to send some data. But for the Federal Government to require equipment installed, paperwork and leg work from already over worked Technology Departments is a BAD idea

RESPONSE to II.B.2.(36)

The majority of the METLA committee agrees that an ACCURATE Broadband map should be modified or created, such as the National Broadband Map, and allows each user/consumer to enter their data. The Map should also include available bandwidth that is actually live and if it is connected to the Internet or not. In Mississippi, there is fiber all over the place from other government programs such as BTOP, which is connected to nothing. That fiber should not be considered. The bandwidth considered must be alive and connected to the Internet to be considered.

The Mississippi data on the national Broadband Map is not accurate as it overstates the availability of broadband in many rural areas of the state. Using the overstated values would be very detrimental to accomplishment of the stated FCC goals so it is very important to be sure that any data used to determine availability be accurate and current.

RESPONSE to II.B.2.(37)

The METLA committee agrees that census blocks should not be the measure. Geography is a key factor, as is population density. Costs should be one data point to be added. High Costs will indicate availability and also provide information on affordability. Type of circuit, and Speed should also be included.

It must also be noted that, although current access to a broadband provider is important, in Mississippi over 700 miles of fiber has been run connecting schools to each other and to the Internet once districts began to submit 470s to see what was available rather than using the easy to use State Master Contract. In most cases the primary provider was thought to be the only provider but when given the opportunity, others came in with substantially lower prices for services, and NO added construction costs at prices significantly under the SMC. This additional fiber includes BTOP fiber that would never have been connected had it not been for districts breaking from the SMC.

This tells us that the current presence of only a single provider does not mean that competition can't take place and increase the number of providers available from which to choose. The key is encouraging the competition to the greatest extent possible.

RESPONSE to II.B.2.(38)

The METLA Committee agrees what is affordable to one, may not be to another. The best way to benchmark affordability is to take each school's Internet Circuit, Transport Circuit, and WAN Circuit costs and divide them by student enrollment to get Avg. Bandwidth per student. Avg. Cost per Mbps, and average cost per student. All this data could be collected from Form 471 and calculated easily. Schools that do not file a form 471 can be asked about their bandwidth on an annual survey.

Affordability is based on several factors. Also, costs are based on many factors. For example, the distance from school to school, the topography, the amount of construction hurdles, etc. Determining affordability will be difficult however competition is a way to keep costs down. We have proven that in Mississippi with 38 districts bidding their on versus using single provider SMC.

RESPONSE to II.B.2.(39)

The METLA Committee agrees, the LCP should be rigidly enforced. This is why it's vital to include Costs in the National Broadband Map. Without access to information on what others are paying, most Districts/Schools have absolutely no idea what the going rate is. The more we know, the better we will be, when considering pricing. The fact that we have been working in a bubble without information from districts and states has made us more vulnerable to the "greed" of local service providers. Until districts broke from the SMC, most thought our pricing was good in Mississippi. We now have information and we know this to be incorrect and we can therefore provide information to help enforce the LCP rule.

RESPONSE to II.B.2.(40)

The METLA Committee agrees that The Commission is correct to take the position that educational outcomes are beyond their core competence. Broadband usage in schools has become as vital to education as is water, sewage, and power. It is a utility, like the others. The actual usage of broadband in the schools is not something that can be regulated or calculated. A school may not use much Internet for a few days at a time because of their schedule or lesson planning, and then may max out the circuit for the next few days. These are internal issues. We recommend that the FCC leave measurement of how much broadband contributes to educational outcomes to the experts.

It would be pointless to try and connect student performance with E-Rate funding -- because we cannot account for, on those measures alone, how that E-Rate funding actually impacted the teaching and learning process. The FCC should focus on funding broadband. Let accountability measures, such as NCLB focus on how well students are learning. You cannot discount the human component in student achievement.

RESPONSE to II.C(42)

The METLA Committee recognizes that funding is limited therefore "maximizing" effectiveness should mean getting the most bang for the buck. In our opinion, this is emphasizing future proof network technologies like Fiber Optic transport, vs. legacy communications technologies. Costs for Fiber Optics should be examined over a multi-year period as the longer it matures, the greater the return on investment. Economic feasibility also should include ensuring that the user bears responsibility for their decisions.

RESPONSE to II.C(43)

The METLA Committee is in 100% agreement that Average Mbps/Student, Avg. Cost per student, and Cost per Mbps are the three values that should be monitored. Simply including circuit costs on the National Broadband Map would show "outliers" (those who are purchasing higher priced services when other options are available).

The information needed to supply this pricing data could come from the 471 application then be transferred to the National Broadband Map to give a fairly accurate comparison for both regional and national perspectives.

RESPONSE to II.C(44)

The METLA committee agrees that cost data entered into the National Broadband Map would easily show the impact of E-rate funding on circuit costs and availability. Cost analysis can be done both vertically and horizontally. Costs for certain types of circuits can be compared locally, regionally, and nationally, and costs for all circuit types can be compared in narrow geographic locations.

The more bandwidth and pricing data that is available, the more districts and the FCC can make sound decisions regarding E-Rate funding.

RESPONSE to II.D(46)

The METLA Committee agrees that a reduction in fraud, waste, and abuse does not have to be complicated, nor does it need to be cumbersome. One suggestion would be to tag equipment purchases with a service level. If router model XYZ is designed to serve 1,000-10,000 users, a red flag should go up when it is being purchased for a school that reports an enrollment of 200 users. Requests for services that exceed common sense service levels should be flagged for further review. Field audit teams should include a member that is versed in technology and familiar with current telecommunications equipment and other equipment often purchased as Internal Connections. The FCC should prepare “canned” contracts that are acceptable to all parties and easier to use than current Forms and Documents. Multi-Year contracts and service agreements should be easier to execute and file for.

RESPONSE to II.D(47)

The METLA committee agrees that the commission should seek ways to eliminate the number of Funding Requests that have to be submitted in multi year contracts. Again, a boilerplate contract for services could be designed that would ensure the Commission of compliance with rules, while eliminating the need for annual review.

RESPONSE to II.D(48)

The METLA Committee is mixed on this question. One suggestion is that Windows could be adjusted to help Districts coordinate their funding requests with budget deadlines. The windows could be closed in February, and then set a deadline of August 1st to fund all priority 1 requests. If priority 2 survives the E-rate revamp, those requests should be granted only after all priority 1 requests are acted on.

However other committee members believe that there are so many variables that effect USAC’s ability to process the requests, that it would be unrealistic to establish such deadlines. This group is also concerned that if such deadlines were imposed, it would decrease the ability of PIA to do a thorough job of screening applications as described in IID(46) and may therefore be contrary to the accomplishment of the stated goals.

RESPONSE to II.D(50)

The METLA committee agrees that this could be accomplished with a survey. The primary barriers to requesting funding are the a) Return for the investment (time vs. money returned) and b) paperwork involved in keeping track of equipment purchased with priority 2 funding.

We also agree that it would be wasteful to retain a third party to perform such an analysis.

RESPONSE to II.E(52)

The METLA Committee is in 100% agreement that all aspects of the expenditure of public funds should be readily available to the public except military or issues of national security. All of the information referred to in previous sections should be compiled and made easily available to the public.

RESPONSE to II.E(53)

The majority of the METLA Committee agrees that FCC form 471 should contain the necessary information to provide USAC with cost per student and bandwidth per student in order to measure the goals of this proposal.

The function of Item 21 is to provide PIA with the necessary information to determine if the request is valid or not. Getting too technical would probably be counter productive to the purpose of the form. The online form, as is, probably contains all of the information necessary to properly measure the merits of the request. We suggest that applicants be required to use the online Item 21 form rather than sending in paperwork such as current bills. This would make the data digital for dissemination to the public and consistent.

We also agree that form 21 data be reviewed by someone with technical background who can easily spot if an applicant is overbuying such as the use of enterprise grade routers for schools with a small enrollment. Then allow these technical experts the opportunity to make changes in the forms if changes are necessary in order for them to be able to accurately assess the requests.

RESPONSE to III.B(66)

100% of the METLA Committee agrees that the primary focus of E-Rate should be providing adequate bandwidth to the classrooms with the initial emphasis being adequate bandwidth to the school buildings. Voice service and any other services that do not accomplish this goal should be removed from the program within the next 3 to 5 years.

The only disagreement among the group is regarding current P2 services that are needed to get the bandwidth to the classroom and how they should be treated. These will be addressed later in this document

RESPONSE to III.B(67)

The METLA committee agrees that fiber optic cable is currently the most future proof technology available and the program should encourage the use of fiber as much as feasible. Other technologies however, must be considered when the use of fiber is prohibitive or the goals can be met with bandwidth levels lower than those that currently must be provided via fiber.

Usage based billing for transport must also be discouraged at all levels. An example is a fiber connection billed as 10meg Metro-Ethernet ... when cheaper equipment would make that same fiber connection Gigabit Ethernet.

RESPONSE to III.B(68)

The METLA committee agrees that the per student goal of 0.1 Mbps next year or 1.0 Mbps in 2017 is the target. If that target can be reached with other technologies where it is virtually impossible to use fiber, then that is what we recommend. However, if the target cannot be reached without fiber, then considerable consideration must be given to the deployment of fiber even if at a very high cost.

RESPONSE to III.B(69)

The METLA committee agrees that managed services should be reviewed, and discouraged. They hide the true cost of Internet Access and allow for the potential of overcharging for the managed services by the providers. Also, some providers may not be equipped to supply managed services. Districts should capitalize on the “free market” system. When there is competition, there are lower prices. Managed services should not be used to justify more expensive circuits.

RESPONSE to III.B(70)

In Mississippi only one district so far is leasing dark fiber. They are running a 10 gig WAN over it and they are the first district in the state to meet the 2017 WAN recommendations.

Providers who do not use usage based billing are in fact providing the same service, except that they provide a switch at both ends.

The METLA committee agrees and recommends that the FCC to do everything possible to encourage districts to use available dark fiber.

RESPONSE to III.B(71)

The METLA Committee agrees 100% that every segment of both dark and lit fiber should be P1 eligible. The program is wasting significant dollars placating the telecoms by making only their services P1 eligible. There are significant savings to be had in both making the electronics for dark fiber P1 and allowing the construction of PRIVATE WANs as eligible.

RESPONSE to III.B(72)

The METLA Committee agrees that leased lit and dark fiber should be treated the same as P1 services.

RESPONSE to III.B(73)

In Mississippi we have found that the companies competing for the business find a 5 year agreement sufficient to absorb most of the costs of construction of most school district WANs in the state. Of the 36 that have been bid so far, most have been 5 year and most did not contain any construction charges yet they still beat the pricing on the SMC significantly even excluding the construction charges that would have been added to most SMC deployments

The committee recommends that there be a limit of 7 years for cost distribution if this becomes part of the policy.

The committee, however, would rather see construction costs come from funding sources other than E-Rate and use E-Rate strictly for recurring costs. There are several such funding sources specifically targeted at deployment of fiber. It would be a directed deployment if used in conjunction with schools and would become part of a competitive process if folded into E-Rate.

In Mississippi we have seen BTOP funds used to deploy fiber around the state with much not connected to anything. We wish to avoid this in the future and ensure that all fiber being deployed be used by someone.

RESPONSE to III.B(74)

District portion of construction costs are a definite factor in districts not deploying fiber circuits.

The committee would rather see construction costs come from funding sources other than E-Rate and use E-Rate strictly for recurring costs. There are several such funding sources specifically targeted at deployment of fiber. It would be a directed deployment if used in conjunction with schools and would become part of a competitive process if folded into E-Rate.

One factor in Mississippi that appears to be deterring fiber construction is the State Master Contract. Because it is so easy to use and it does not require the districts engage in competitive bidding for the services from the single vendor, companies willing to run the fiber are unable to do so because they are not being given the opportunity to do so. 700 miles of fiber has been run in Mississippi since districts began to bid for WAN services rather than simply purchase from the SMC.

The METLA Committee agrees 100% that the FCC should encourage competition among the providers to ensure both price competition and deployment of fiber.

RESPONSE to III.B(75)

Unless a substantial amount of money is added to the E-Rate fund, middle mile construction for E-Rate deployments should be done with other funds that are targeted for fiber deployment such as Connect America. E-Rate funds should be

If, however, E-Rate funds are to be used for such construction then encouraging districts to enter into long term contracts, max 7 years, would be prudent.

The METLA committee agrees 100% that funding priority for construction should be focused on areas currently not serviced or currently under serviced and not based on Rural or Urban classifications. In many cases the under serviced would be what is currently considered rural but there are some urban areas that are under services due to poverty or lack of deployment of broadband for business and consumers in these areas. In Mississippi many areas considered Rural now are fully serviced. So the criteria must be degree of current availability of service and not Rural or Urban

RESPONSE to III.B(76)

The majority of the METLA committee agree that Broadband maps with input from the local stakeholders would be the best way to determine need for fiber builds. State or Tribal governments would certainly have input into the content of a Broadband map but should not have the final say.

RESPONSE to III.B(77)

The METLA committee agrees that fiber should be the preferred method because today, it is the most future proof technology available. Where fiber is not practical, other methods must be considered so as to provide the best possible solution for the best possible price.

RESPONSE to III.B(78)

The METLA committee is unanimous in that recurring costs should have priority over construction costs. As has been stated before, the committee agrees that other funding sources targeted for fiber construction should be used for construction costs and E-Rate should be used for the recurring costs.

RESPONSE to III.B(79)

The METLA committee agrees 100% that private WANs should be allowed as P1 if the cost of construction can be shown to be at or less than telecom services with the same functionality for 5 years. Presumably, there would be very minimal costs to maintain the service and therefore less demand would be placed on the fund long term vs. use of telecom circuits.

RESPONSE to III.B(80)

The METLA Committee agrees that the FCC should remove Section 54.518 and allow WAN purchases if it can be shown that the purchase will cost less than 5 years of service from telecom providers. This will only serve to drive pricing down from the telecoms and give districts additional sources of competition for services.

RESPONSE to III.B(82)

In Mississippi we have found that the most effective way to get fiber deployment is to increase the competition among the telecom providers. The only way to do this is to ignore the single vendor SMC and have districts bid their own. Over 700 miles of new fiber has been run in the past 3 years from districts who have broken away from the SMC and bid their own. The biggest benefit is that the recurring costs have dropped significantly below SMC prices. The FCC must continue to encourage competition in the marketplace.

RESPONSE to III.B(83)

The majority of the METLA committee agrees that P2 funding should be limited to providing service to the school classroom. Further, it should only be allowed after the initial needs for Internet and broadband circuits have been met, it should be at a 10% to 15% discount lower than P1 services and it MUST be on a rotational schedule so that everyone has a chance to receive funding periodically.

The committee majority agrees that placing the stated restrictions would spread the funding more equitably and it would encourage more frugal use of the funds by placing a larger burden on the districts for the P2 equipment.

RESPONSE to III.B(84)

In Mississippi, most schools have wired connections to the classrooms. Some are new and many are old. Most are gigabit wired connections. At this time most of the districts in Mississippi do not have high capacity wireless in place but are ready to deploy as funds become available. Generally those in existence today in Mississippi consist of high capacity wireless access points in or near each room connected to the network with Gigabit or higher cable connections.

RESPONSE to III.B(85)

The FCC should focus P1 services to ONLY providing adequate Internet broadband to the schools. The majority of the METLA committee agrees that P2 funding should be limited to providing service to the school classroom. Further, it should only be allowed after the initial needs for Internet and broadband circuits have been met, it should be at a 10% to 15% discount lower than P1 services and it MUST be on a rotational schedule so that everyone has a chance to receive funding periodically.

RESPONSE to III.B(86)

The METLA Committee is in 100% agreement that CIPA related filtering should be included as a P1 service as it is required to provide adequate broadband to schools.

RESPONSE to III.B(88)

In Mississippi the consortium, State Master Contract, is the most expensive method we have to purchase bandwidth. It is a single vendor contract initiated in 2005. Much fiber has been run by other providers since that time yet they are unable to compete for E-Rate dollars unless the districts break from the SMC. Since the bid process is so cumbersome in Mississippi, many districts choose to continue with the state contract because of its ease of use, disregarding the significantly higher costs of the SMC.

The key factor in Mississippi in driving down costs is competition. The price of Gig WAN in Mississippi has dropped 50% since districts began to break from the SMC three years ago. Pricing for Internet has dropped much more than that were districts now have Internet transport circuits and Internet for from \$5.00 per Mbps to \$10.00 per Mbps from over \$100.00 per Mbps just 3 years ago. Even pricing on the SMC has dropped dramatically since the competition was introduced

The METLA Committee does not object to the use of SMCs and consortiums but it is imperative that we continue to be allowed to bid for our own services. The majority of the committee agrees that districts should be allowed to bid for their own services but be required to compare bids with the same services on a state contract or a consortium contract as if it were a bid.

It should be noted that half of the METLA committee believes that districts should be REQUIRED to bid for services to ensure the competition is given a chance to compete against a single vendor SMC that does not require the bid process.

To those of us in Mississippi, it is obvious that competitive pressure must be in the market place to ensure the best pricing possible for E-Rate services.

RESPONSE to III.B(89)

The METLA committee agrees that eventually, cost caps may be a good way to keep costs down but at the present, they should not be considered.

The committee agrees 100% that all of the questions on the table should be revisited annually to ensure the E-Rate program is accomplishing its goals and that new technologies and school needs are addressed as well.

RESPONSE to III.B(90)

The METLA Committee agrees that any services that are not directly related to providing high speed adequate Internet to the classroom should be removed from the ESL. The majority agree that the removal of services should be phased in over a 3 to 5 year period in order to allow districts to adjust to the new paradigm.

RESPONSE to III.B(91)

The METLA Committee agrees that any services that are not directly related to providing high speed adequate Internet to the classroom should be removed from the ESL. The majority agree that the removal of services should be phased in over a 3 to 5 year period in order to allow districts to adjust to the new paradigm.

RESPONSE to III.B(92 through 103)

(responses to paragraphs 93 through 103 are identical)

The METLA Committee is in 100% agreement that services not related to providing adequate broadband Internet to the classroom should be removed from the ESL gradually over a 3 to 5 year period.

RESPONSE to III.B(104)

The METLA committee agrees with the SECA recommendation. We do, however, believe that the switches that connect the proposed cabling be included in the P2 ESL.

Again, the METLA committee recommends that P2 funding be included only if it is on a rotational basis so that everyone has an opportunity for funding periodically and if the discount rate for P2 is from 10% to 15% below the rate for P1 services in order to encourage more frugal spending of the P2 funds.

RESPONSE to III.B(105) and (106) *(responses are identical)*

The METLA Committee is in 100% agreement that services not related to providing adequate broadband Internet to the classroom should be removed from the ESL gradually over a 3 to 5 year period.

RESPONSE to III.B(107)

The METLA Committee agrees that the only part of VoIP that should be supported is the bandwidth needed to provide the service and that is only because it is part of the infrastructure needed to provide classrooms with high speed broadband services. Any other costs associated with VoIP or hosted VoIP should be removed from the ESL.

RESPONSE to III.B(108 through 113)

(responses are identical)

The METLA Committee is in 100% agreement that services not related to providing adequate broadband Internet to the classroom should be removed from the ESL gradually over a 3 to 5 year period.

RESPONSE to III.C(117)

The majority of the METLA committee recommends that the discount rates be lowered from 10% to 15% to encourage more frugal spending of E-Rate funds and to make funds available to more districts.

RESPONSE to III.C(118)

The METLA committee agrees that the discount lowering should occur over a 3 to 5 year period of time to allow districts to adjust their budgets to the changes.

RESPONSE to III.C(119)

The METLA committee agrees that lowering of discount rates would encourage more frugal spending and recommends that this be done

RESPONSE to III.C(122)

The METLA committee agrees that lowering of discount rates would encourage more frugal spending and recommends that this be done.

RESPONSE to III.C(123)

The METLA Committee agrees that changes in the program should be phased in over a 3 to 5 year period of time.

RESPONSE to III.C(124)

The METLA committee recommends that discounts be reduced from 10 to 15%.

RESPONSE to III.C(125)

The METLA committee, when the commission is focusing on P1 services of providing broadband Internet to the schools, they should consider availability of services to the schools rather than NSLP status for determining discounts.

RESPONSE to III.C(128)

The METLA Committee agrees with SECA in that the district average would better reflect the districts ability to pay and would be great under the current system. However we still believe, when referring to P1 that is limited to providing broadband to the schools, that the criteria should be “Availability of Services” to determine discounts, not other criteria.

In Mississippi there is a prime example of what we are talking about. Consider the following three districts.

- Columbia School District is rural with a current 87% Discount. They have two providers with infrastructure already in place to provide services. They pay \$5.00 per Mbps for Internet service.
- Rankin County is considered to be a rural district. Their discount is 60%. They pay about 5.00 per Mbps also. They have three providers with infrastructure in place who can compete for their services.
- Pontotoc County is rural and spread out. They are a 80% district. They have only one provider and no competition. The Mississippi Department of Education pays \$73.00 per Mbps on their behalf.

Because the competition is not present, Pontotoc counties costs are significantly higher and they would need significantly more E-Rate support to afford to meet the goals. Columbia and Rankin County would need about the same support because they are paying the same thing for the competitive services in their area. Rural and F&R has nothing to do with need in this case. The Committee believes that if you intend to reach your goals, you must consider to factors.

The higher discounts need to go to those who have the fewest available services because they will need the help more. Construction costs for deployment of fiber should not be the burden of the districts, nor should it be the burden of the E-Rate program unless funds are ADDED for that purpose.

RESPONSE to III.C(129)

If the commission insists on using NSLP figures for determining the discount then the METLA committee has no problem with this revision.

However, the committee urges the Commission to consider basing the discount for P1 services targeted only to providing bandwidth to the schools on availability of services rather than F&R figures.

RESPONSE to III.C(130)

The METLA committee agrees that if the FCC would consider the use of “availability of services” rather than Rural, Urban and F&R rates for discounts, the issues you are attempting to address by expanding the definition of “rural” would be addressed.

Further, the METLA committee agrees that if another funding source were to pay for construction, there would be no need for such designation changes.

RESPONSE to III.C(131)

The METLA Committee has no objection to this. The committee agrees that the Discounts for P2 services should be less than that of P1 services and that P2 should be limited to only equipment and services needed to provide Broadband Internet to the classrooms. Also, that P2 be placed on a rotational schedule to allow all districts a chance at P2 funding.

This proposal should make the rotational schedule for P2 funding easier to administer because the graduations will be by 1% point rather than the 10%

RESPONSE to III.C(132)

The METLA committee has no objection to this.

RESPONSE to III.C(133)

For P1 the METLA Committee agrees that discounts should be determined by availability of service not by F&R or Rural status. For P2 services, in most cases the F&R could be a good indicator of need more so than rural or urban. The committee agrees that there should be no additional discounts for P2 services based on Rural or Urban status.

RESPONSE to III.C(134)

For P1 the METLA Committee agrees that discounts should be determined by availability of service not by F&R or Rural status. For P2 services, in most cases the F&R could be a good indicator of need more so than rural or urban. The METLA committee agrees with this proposal for P2 funding ONLY.

RESPONSE to III.C(135)

The METLA committee DISAGREES COMPLETELY with the Funds For Learning proposal. Such a proposal would be devastating to the under served districts in the US and would likely destroy the ability of the commission to meet your goals.

The METLA committee believes that the solution to the inequity is to require or at least encourage competition.

The committee realizes that such a proposal would likely have the effect of more frugal expenditure of funds, and we all agree this should be encouraged by every action of the commission, however this proposal would be counter to the goals set forth by the commission in this document.

RESPONSE to III.C(136)

The METLA committee agrees that reducing the discount rate for P1 funds by 10 to 15% and reducing the rate for P2 funds even more, would accomplish the task that the “Funds for Learning” proposal is apparently seeking to accomplish without destroying the possibility of the commission reaching its goals.

Further, the METLA committee agrees that P2 funding must be put on a rotational schedule further accomplishing the apparent goals of the “Funds For Learning” proposal also without eliminating the possibility that the Commission’s goals can be met.

RESPONSE to III.C(139)

If a cap is imposed, the METLA Committee agrees that construction costs for deployment of fiber for P1 services should not be considered in the per student cap. The METLA Committee agrees that the best way for the commission to reach its goal of 100 Mbps per 1000 students, construction costs must not be borne by the districts at all. Further, the Committee agrees that all P1 related construction should be done with funds other than the normal E-Rate funds either from another source such as Connect America or from funds ADDED to the current E-Rate allocation.

RESPONSE to III.C(140)

This situation is why the METLA committee considers caps a bad idea. If the commission funds, outside of the current E-Rate funds, the construction, so that the infrastructure is in place for all schools, then the recurring costs will be similar and then caps may be a valid consideration. Until the infrastructure is in place, however, the “Funds for Learning” proposal should be set aside.

RESPONSE to III.C(144)

The METLA Committee agrees that the 2 in 5 rule should be rescinded and replaced with a rolling funding cycle for P2 funding so that every district has a chance at P2 funding.

RESPONSE to III.C(145)

The METLA Committee agrees that the 2 in 5 rule should be rescinded and replaced with a rolling funding cycle for P2 funding so that every district has a chance at P2 funding

RESPONSE to III.C(146)

The METLA Committee was split on this question but we compromised. Some members believed that you should include internal connections as P1 but the reasoning was so that those who are lower in discount would have a chance at the funds. Some of the committee members believed that internal connections should not be on the table at all until the bandwidth Goals per student were met.

The compromise is the METLA Committee agrees that Internal connections should not be considered as P1 as long as the following conditions are met.

P2 funds are limited to equipment needed to supply broadband Internet to the classroom. P2 Funds MUST be put on a rolling funding cycle as suggested by SECA in order to ensure that all districts have a chance to receive P2 funds periodically

P2 discounts should be less than P1 discounts in order to encourage more frugal use of the funds by districts in the higher discount levels.

RESPONSE to III.C(148)

The METLA Committee agrees that the current P1 and P2 prioritization should be maintained with the condition that P1 services be limited to ONLY providing Broadband Internet to the Schools and P2 being limited to ONLY providing Broadband Internet to the classroom and that it be on a rolling cycle so that everyone would be able to receive P2 funds periodically.

If other services are going to be considered other than those specified above, then the committee agrees that they should be included in such a way that their priority is below P2.

RESPONSE to III.C(149)(150)(151)(153)

(responses are identical)

The METLA Committee agrees that this approach would be counter productive to your goals.

RESPONSE to III.C(154)

The METLA committee agrees that a fixed allocation as is proposed may have the effect of lowering pricing because the providers know up front what is available but it could just as easily have the effect of increasing prices.

The METLA committee agrees 100% that the FCC should encourage competition for every dollar. In Mississippi, the implementation of competition for bandwidth instituted only three years ago has driven costs down significantly vs. using the single SMC.

RESPONSE to III.C(155)

The METLA Committee encourages the Commission to provide incentives for consortium formation in order to help provide additional options for purchasing by districts. We do not believe this proposal would accomplish that objective.

RESPONSE to III.C(156)

The METLA Committee agrees that the discounts for both P1 and P2 services should be lowered to encourage more frugal spending of the funds. The committee also agrees that P2 discounts should be less than P1 discounts.

RESPONSE to III.C(157)

The METLA Committee agrees that this approach would be counter productive to your goals.

RESPONSE to III.C(158)

The METLA Committee agrees that this approach would be counter productive to your goals.

RESPONSE to III.C(159)

The METLA committee is 100% against relaxing the rules regarding competitive bidding at all. In Mississippi we have seen where competitive bidding for P1 services that began only 3 years ago has driven prices down to where districts can now afford to meet the Commission's goals. Until then, districts were using the State Master Contract and pricing is so high that most could not afford to provide the necessary bandwidth to meet the Commission's goals. Many of our committee members are very concerned that our Mississippi peers who still purchase from the SMC are not going to be able to provide the necessary bandwidth to meet the growing needs of their teachers and students.

METLA and our Parent Organization MECA (Mississippi Educational Computing Association) have made an effort to education Superintendents and Technology Coordinators regarding the options but many still use the SMC because it is easier.

The Committee believes that this proposal may have the effect of putting the entire US in the same situation we have had in Mississippi for years with the SMC. If the commission makes it easy to avoid the competitive process then that is exactly what will happen and the competitive downward pressure on prices that we have seen in Mississippi would be diminished or eliminated.

The METLA committee is very convinced that completion is the key to lowering prices and that any action that reduces the chance of competition by the Commission would be detrimental to the future of the program as well as the ability of the Commission to reach its stated goals.

RESPONSE to III.C(160)

The METLA Committee agrees that this approach would be counter productive to your goals.

RESPONSE to III.C(162)

The METLA Committee agrees that this approach would be counter productive to your goals.

RESPONSE to III.D(164)

The METLA committee agrees that any incentive the FCC can give for new fiber construction would be helpful. However, to accomplish the goals of the proposal, the cost of construction of new fiber is going to have to be covered without contribution from the districts. We urge you to allocate other funding sources such as Connect America funds for this purpose and use E-Rate funding for recurring costs or for private WANs that would have no recurring costs. The METLA Committee agrees that if E-Rate funds are to be used for construction, additional funds should be allocated to the pool specifically for that purpose.

In Mississippi, much of the fiber that has been run to supply districts with WAN and Internet service not from the State Master Contract, has been run for cellular backhaul and the cost of construction has been buffered because of this. We have seen this work well in Mississippi cutting our WAN recurring costs in half in many places still without a specific charge for construction. The Committee agrees that every step the FCC can take to encourage providers to share the cost of construction would be beneficial and would enhance the chances that the Commission will reach their stated goals.

RESPONSE to III.D(165)

The METLA Committee agrees that in order for the Commission to reach the stated goals of this document the burden of construction must not be on the districts.

RESPONSE to III.D(167)

The METLA Committee agrees that Connect America funds would probably accomplish more if they were used to pay for the construction costs associated with accomplishing the goals of this proposal than any other use.

RESPONSE to III.D(168)

The METLA committee agrees 100% that E-Rate P1 funds should be limited to recurring costs unless funds are added to the pool for construction. This would mean that construction costs would have to be covered some other way. The committee also agrees that if the Commission is to reach its stated goals, the costs of construction must not be borne by the districts.

RESPONSE to III.D(171)

In Mississippi, the most expensive source of services is the State Master Contract. The FCC should get beyond the notion that consortiums are always going to be the best pricing possible. They are not.

The METLA Committee agrees that the way the SLD should deal with consortium pricing and SMCs is to require that districts competitively bid but that they must compare their pricing with the consortium or SMC before awarding a contract.

Especially for WAN and Internet services which vary from locality to locality. In Mississippi, more than 60% or more of the districts could easily beat the SMC pricing for both WAN and Internet services by bidding locally. It simply makes no sense, after

seeing the downward price pressure placed on Internet and WAN circuits in Mississippi once competition was introduced, for the FCC to relax competitive bid requirements for any reason. Competition in the marketplace is the only way to keep pricing down.

RESPONSE to III.D(172)

The METLA committee agrees that in order to accomplish the goals of the document, the FCC must either add additional funding to cover construction costs or construction costs must be borne by another funding source. Districts strapped for funds are going to be unable to pay even the discounted portion for construction of a fiber infrastructure.

In Mississippi, if you were to disallow use of the State Master Contract without a local competitive bid first, we believe the program would save more than a million dollars annually. In Mississippi, P1 service costs are very localized, the competitive bid process is essential to getting the most for the E-Rate dollar.

Encouragement of consortium purchasing may be the best thing for P2 purchases but in Mississippi it is never going to be the best way to purchase P1 services. Encouraging the use of consortia is fine only if it is coupled with the requirement to locally bid for P1 services.

BTOP money has been spent and fiber has been pulled all over the US. However, much is just sitting in the ground connected to nothing. The only way this fiber is going to be used is if the entities in the areas where it is located are allowed to locally bid for services that could be provided using that fiber. A consortium would most likely exclude the use of that fiber unless the consortium is made up of ONLY districts that have such fiber in place. In Mississippi, several districts are taking advantage of BTOP fiber and are receiving services for significantly less than the SMC pricing but they had to do a formal procurement process for the ability to use that option.

Cellular companies need to get fiber to their towers to provide LTE services. If they have a chance to bid for E-Rate services in an area where they are needing the fiber for their towers, they will be able to give school districts a very good rate for WAN and Internet services because the districts will be additional income for the fiber they are already running.

If a district does not solicit bids, however, the cellular company will be unable to pass the savings on to the district. In Mississippi this has happened many times and districts are receiving WAN services for 60% of the SMC and Internet services for 25% of the SMC.

The Committee agrees that consortiums should be allowed and encouraged but never at the expense of local district competitive bidding.

RESPONSE to III.D(173)

The METLA Committee agrees that additional temporary funds should be targeted at construction costs for P1 services assuming P1 is limited to Internet and WAN services. Additional funds should be used for no other purpose than to meet the stated goals of this document.

RESPONSE to III.D(174)

The committee agrees that all of these proposals should be revisited annually. If it becomes apparent that the goals are not being met with current funding then the METLA committee recommends that provisions be made, possibly permanently to meet or maintain the goals. This should be a future decision, not one for right now.

RESPONSE to IV.B(180)

The METLA Committee agrees that consortia should be encouraged but it does not agree that consortia will necessarily provide the advantages mentioned above. First, if the Commission considers a State Master Contract as a consortium, then the committee disagrees greatly. In Mississippi, the SMC has been the single factor that has held prices high because it virtually eliminates competition.

Until districts in the state began seeking alternatives for services by competitively bidding, prices were being held artificially high. The company running BTOP fiber in the state using school districts as anchor institutions and a Mississippi company that runs fiber for state cellular towers encouraged districts to initiate competitive bids for the services so that they could enter the market. Since then prices have plummeted well below the SMC pricing.

The Committee agrees that SMCs, should be encouraged but their pricing should be only considered as a bid response to a competitive process and not be used in place of competitive bidding.

The Committee agrees that the same should be for other types of consortiums. Districts should be encouraged to become part of consortiums to share resources and therefore lower pricing but they should not be prohibited from seeking services themselves.

The committee agrees that if a district seeks pricing for services, they should be required to consider any SMC or consortium pricing available to them as an additional bid to ensure they are getting the best pricing possible.

RESPONSE to IV.B(183)

In Mississippi the purchase of Broadband through consortia (not including the SMC) has been beneficial in that it allowed districts to purchase without a formal bid process as required by the state since the consortium did the formal bid process for them. In that case, the resulting contract was a multi-vendor contract in which the districts held a Mini Bid process with all providers solicited for participation in the mini bid. This process could be done much faster and the benefit of the competitive bid process were maintained.

The Committee agrees that any process that encourages or requires competitive bidding is appropriate.

The committee has not addressed the issue of P2 consortiums. The State of Mississippi once had an E-Rate eligible master contract for various P2 services and equipment but has opted not to continue the E-Rate eligibility of the contract. Because of the mini-bid process that was required to use the contract is similar to the current process except for the filing of the 470, it probably has not made much difference in P2 costs. The committee agrees that the competitive bidding must continue to be the corner stone to E-Rate purchasing regardless of if it is P1 or P2 purchasing.

RESPONSE to IV.B(184)

Districts with high discount rates are reluctant to join consortia with districts with low discount rates because it increases the higher discounted district's cost for services.

RESPONSE to IV.B(185)

The METLA committee agrees that there is a distinct possibility that some service providers may be unable to compete in a consortium bid but may be able to compete and even win in bids done by districts within the consortium.

This is especially true in Mississippi. The State Master Contract is all inclusive such that only one provider can participate. There are two other providers in the state that can compete in some areas and not in others. For example, the BTOP provider has the fiber run throughout the area specified in the grant. They can give very good pricing to districts within those areas but not in areas where they would be required to deploy more fiber. This problem would be eliminated if the Commission decides to use other or additional funds to fund construction.

The other company supplies fiber to cellular towers are using school district E-Rate purchases to help deploy that fiber, and bringing the district costs down substantially vs. the SMC. Districts that reside in areas where they have several cell towers are receiving these good prices so if a district were in a consortium of 5 districts and only one had the necessary concentration of cellular towers in their district, then the company would not likely be competitive in a consortium but would be in the one district.

The METLA Committee agrees that the proper way to deal with this situation is to allow districts to bid for their own services but be required to use a consortium price and/or a SMC price as a bid if one is available to them. This will allow access to the smaller providers without diminishing the benefits of the consortium.

RESPONSE to IV.C(186)

The Mississippi State Master Contract for Internet and WAN services, because it is a single provider contract and requires no special procurement process on the part of the districts, i.e. the issuance of a 470, appears to have artificially held pricing for E-Rate services in our state much higher than the market.

The METLA Committee, because of our experiences in Mississippi, unanimously agree that the FCC should NEVER require districts to purchase from any SMC or from any consortium. If you were to do so now in Mississippi, it would increase costs to E-Rate dramatically.

Our organization has encouraged districts to seek other alternatives through the 470 process and now over 36% of the students in Mississippi will be serviced by companies not associated with the SMC. The cost per student and the cost per Mbps for the districts serviced off the SMC is substantially lower than the SMC serviced districts.

We have attached two documents (Attachment A &B) which show the districts in Mississippi and the various ways they are receiving Internet service and the costs for the services. These documents make it crystal clear why it would be devastating to the districts in Mississippi to require that they purchase from the SMC. It shows clearly how the introduction of competition three years ago has driven the price of services down in Mississippi, including the SMC prices. We estimate that for the 2013 – 2014 E-Rate year the fund will save much more than a Million dollars because of the efforts of this organization and the efforts of the individual districts to allow the competition to compete.

Again, the METLA committee agrees that Consortia and SMCs should be encouraged but districts should be encouraged or required to seek services themselves to take advantage of local service availability conditions and use the SMC only as another bid to use during the evaluation process.

It should be noted these documents were NOT prepared by the METLA committee, but we feel that they should be included because they clearly illustrate our position on fair and open bidding as a cost effective means to procure services.

RESPONSE to IV.C(187)

The METLA committee agrees that competition should be the key factor in determining price. If such a purchasing program comes about, it should be an option from which we could purchase and not a requirement. It should be a requirement that if the local district cannot beat the pricing through a bid process then they must purchase from the program or USAC could limit reimbursement to what it would be had they purchased from the program.

The METLA committee has seen such dramatic results in price reductions due to local competition that it is reluctant to recommend any process that removes the competitive process. The committee would readily agree to accept the bulk purchase price as a bid required to be considered when making purchases.

RESPONSE to IV.C(189)

The METLA Committee agrees that other options should not be foreclosed in lieu of bulk buying opportunities.

RESPONSE to IV.D(191)

The METLA Committee agrees that all aspects of E-Rate should be completely transparent to the public. This would include making Item 21 information available. This would provide districts and vendors with the necessary information to use in determining LCP for services and allow service providers to inform districts that they may be able to get better pricing.

The METLA Committee agrees that any action by the Commission that would spur competition would be beneficial and have the effect of lowering prices and therefore costs to the system.

RESPONSE to IV.D(192)

The METLA Committee agrees with the National Broadband Plan and encourages the Commission to create a venue for the public to be able to see how their money is being spent. This would hopefully encourage more frugal spending by districts who may not have the incentive to do so now. Press releases for the local press for their local schools would likely incentivize more frugal spending as well.

RESPONSE to IV.D(193)

The METLA committee agrees that it would be more accurate and therefore more effective to report the statistics at the time of the 486. However we also realize that in order to accurately determine the reasonableness of a purchase by PIA, some information must remain on the 471. For example, the purchase of a router designed to service 10,000 units for a school with 100 students would be an unreasonable purchase and should be rejected. However, if the number of students in the school is not reported on the 471 or at least easily available to PIA then there is no way for PIA to make the determination.

RESPONSE to IV.D(194)

The METLA Committee agrees that the best way to compare prices is with a competitive bid process, however, if pricing lists and forums are available, districts should be required or encouraged to consult those lists before or during the bid evaluation process to ensure that they are getting the best pricing available.

The commission could require PIA to compare district requests for funding with the pricing lists to be sure the district's requests are inline with the market value of the equipment or services.

RESPONSE to IV.D(195)

The METLA Committee did not address this issue but at least two committee members would endorse the posting of all bid responses to a publicly available forum if there are no court orders prohibiting such posting.

In Mississippi, there is a county court order involving the public availability of the SMC. We do not know the details of that court order so we do not know if districts can post publically the bid responses from the SMC.

There is the possibility that if a service provider is giving what amounts to an school discount, it could have an adverse effect on their pricing for business and would therefore tend to elevate prices.

The METLA Committee believes that if competition is available through a competitive bid process, the market will reach its minimum price.

RESPONSE to IV.D(196)

The METLA Committee agrees that the public should be allowed to view Item 21 information.

The METLA Committee agrees that current costs should be available to the public as well but those costs should come from 472 data as it is the only document that gives that information. For Internet circuits, a 471 would typically give the maximum cost for bandwidth anticipated over the year and not necessarily the cost incurred by the district at any given time during the year.

RESPONSE to IV.D(199)

The METLA Committee agrees that competition is the key to lower pricing. What you are describing is similar to a State Master Contract on a federal level. Our experience in Mississippi is that SMC pricing is not always the best. You should not exempt districts from competitive bidding but should require that districts consider the prices as an additional bid. The METLA Committee agrees that the only way you will meet your goals for a reasonable cost is to ensure competition remains the cornerstone of the program. Making it easier on the applicants is a good thing but that should never trump frugal use of the funds.

RESPONSE to IV.E(202)

In Mississippi, most districts chose not to bid at all and therefore purchase from the single vendor SMC for all telecom services. When the SMC began in 2006, the infrastructure was not in place to supply districts with services. It is now in place in most districts with a few still having to rely on low bandwidth copper connections to some remote areas.

In many cases in Mississippi, the SMC provider is the only provider in the area and if a bid was placed, would be the only bidder.

If, however the Commission were to provide funding for the infrastructure, at least two other companies in Mississippi, and hopefully more would be willing to bid in some of the extreme cases where the building of the infrastructure would normally be cost prohibitive. For the long term, having the competitive pressure statewide would most likely keep pricing down as we in Mississippi have already seen with those who have bid rather than use the SMC.

Another long-term benefit of encouraging other companies to build the infrastructure is that it could allow others to become part of the SMC and not just the current provider. As it is, there is only one provider in the state right now who can fulfill the statewide terms of the contract.

The SMC is easy to use and it relieves the districts from the hassle of a bid process but, because it is inherently non-competitive as a single vendor contract, the ease of use has in effect, kept other providers out of the market because they are not given a chance to bid on services were districts only use the SMC.

The METLA Committee agrees that competition in the market place and the downward pressure on pricing created by the competition is likely to be the only way the Commission will meet their goals without a substantial permanent increase in funds.

The METLA Committee agrees that districts should be encouraged or required to bid then use SMC prices as if they were additional bids during the evaluation process. Districts should not be relieved of their obligation to seek the best pricing possible for E-Rate services.

RESPONSE to IV.E(203)

In Mississippi, judging by the past three years, if the infrastructure was paid for by funds other than E-Rate, or additional funds added to E-Rate such that the district was not obligated for any construction costs, we believe that others would bid for services where there is currently only one available provider.

The METLA Committee agrees that competition is the key to lower pricing as has already been seen in Mississippi. Any actions that the Commission could take to spur that competition would be, in the long term, beneficial toward meeting the stated goals as well as a mechanism for keeping prices down for the future of the fund.

RESPONSE to IV.E(205)

First, the METLA Committee is recommending that the Commission drop all E-Rate funded services except those that are directly related to providing broadband connectivity and broadband Internet to schools and if fund are available, P2 services that are directly necessary to provide Internet broadband to the classroom with the P2 being on a rotational schedule were everyone will eventually receive funding.

If the Commission were to adopt this recommendation, then the complexity of what is being requested on the 470 should be significantly simplified due to the limits placed on what can be purchased.

In Mississippi we are required to solicit bids for E-Rate services through a formal bid process that includes a detailed RFP. The 470 could require a detailed RFP. We agree it may place an extra burden on districts in states the do not require a formal bid but it seems reasonable to assume that a district asking for thousands of dollars in services should be able to effectively articulate exactly what they are needing.

RESPONSE to IV.E(206)

The METLA Committee agrees that competition is the key to lowering and holding down prices. The 470 process generally provides for competition. Some states may not require a competitive process especially for telecom services. If such a situation exists, this proposal would relieve districts in those states of the competitive bidding requirement. We do not believe this would be a good idea. The same would be true for the de minimus exemption. In order to meet the goals set forth in this document, the METLA Committee agrees that the Commission must encourage competition in all levels of the process.

RESPONSE to IV.E(207)

The METLA Committee agrees that competition is the key to lower pricing and meeting the states Commission goals. In the case of SMCs and MSAs the committee recommends that the commission encourage or require districts to engage in a competitive bid process and then use pricing from the state SMCs or MSAs as if it were a bid during the evaluation process.

Our pricing in Mississippi clearly shows the benefits of not using the SMC in both lower pricing and services provided to our students that are much closer to the commission's goals.

The availability of the SMC and MSA for use by districts for the purchase of allowable for E-Rate services without a bid has many districts in Mississippi in a three-year contract for WAN services for a price considerably higher than the current market price for the same services. Rather than bid for services, where many would likely have gotten a much better price due to cellular tower concentration in their area or the presence of BTOP fiber, they choose to accept a 3 year MSA for the same services at a higher price presumably because it was easier.

The METLA committee is firm on its recommendation that the Commission not waver on the requirement for competitive procurement in every aspect of the program.

RESPONSE to IV.E(209)

The METLA Committee agrees that USAC should better enforce the LCP rules as they are now.

RESPONSE to IV.E(210)

These clarifications are needed and once stated should be enforced.

In Mississippi the SMC has a price redetermination every two years. Although it is within the ten year term of the contract, we believe that the LCP should be applied at this time also. This is also true in many of the contracts districts have negotiated as a result of the bidding process.

We believe that, if a price redetermination clause is in effect in a contract, that the LCP rule should apply at the time of the price redetermination within the term of a contract.

RESPONSE to IV.F(211)(212)(213)

(All responses are identical)

The METLA Committee agrees that districts should be using services that are cost effective for the purpose for which they are being used. The Committee recommends that during the review process for 471 applications, that the requested services and equipment be reviewed in terms of what it is being used for.

For example, compare the amount on Internet Bandwidth requested to the student population. If it is excessive compared to the norm or to set targets, then further investigation would be in order.

Another example, if a router is requested that has the capacity for 10,000 users and is to be placed in a school building with 200 students, then further investigation would be in order.

Another example, if a switch is being purchased to replace a two year old switch or new cabling is being pulled inside a building where the current cable is only two years old, then further investigation would be in order.

For USAC to be able to make these determinations would require additional input from the districts on the 471 or the Item 21 Attachment but this is needed to safeguard the process

The METLA Committee agrees that there could be circumstances in both of the above examples that would justify the purchases but when a purchase appears to be wasteful and abusive, it should be investigated.

RESPONSE to IV.F(215)

The METLA Committee agrees that all services unrelated to providing Broadband and Broadband Internet to the schools should be removed from the P1 ESL. If that is the case then most of the issues described would be moot.

Limiting eligible services to the recommended target of getting Broadband Internet to the schools would eliminate most bundled services options. Two that we can think of are the bundling of switches, routers and or Firewalls with the service provider circuit and bundling Web filtering for CIPA compliance with the Internet circuit.

In Mississippi, it appear to be evident that the bundled “free” Web filtering is very expensive yet it is a major factor in district decisions to stay with the SMC rather than solicit bids for their own Internet. See Attachment B

RESPONSE to IV.F(216)

The Commission should always consider the long-term benefits against early costs. Shortsightedness in this area can be extremely costly in the long run.

The METLA Committee recommends that WAN circuits be allowed if it can be shown that the cost is equal or less than the cost of telecom provided services over a 3 to 5 year period. After the cost is recovered, there will be no substantial recurring costs for years.

In Mississippi, districts that bid for Internet services, breaking from the SMC, were given pricing below the SMC price at the time. However, included in that pricing was construction costs spread over the term of the contract. Circuit pricing was, for example, higher for a 3-year contract than for a 5-year contract because the construction was spread out over a longer period of time.

The Columbia School District was one of these districts. Their price for Internet service was around \$75.00 per Mbps on the old contract yet still far below the SMC pricing at the time. The district has just received new pricing resulting from a new bid and beginning in 2014, the price will be around \$6.00 per Mbps. The difference is that in the first round, construction costs were folded in the price, however they still beat the SMC pricing at the time.

The METLA Committee agrees that as the infrastructure is deployed and construction costs covered, costs for recurring services should drop, lessening the load on the fund. The Commission should consider the long term costs to the fund when making any decision.

Attachment A

The following pages show detailed pricing information compiled in March 2013 for K12 Districts in the state of Mississippi.

The information contained in this attachment was not compiled by METLA or by the METLA Committee. It was compiled by an interested METLA member who wanted to see some of the information to help him and others evaluate the cost effectiveness of the various ways Internet is being provided to districts. Much of the information in these tables is similar to the information the Commission proposes to be collected from all E-Rate recipients to help evaluate the cost effectiveness of the program itself.

The student enrollment information came from the March 2013 data collected by the Mississippi Department of Education.

The bandwidth amounts were provided by the Mississippi Department of Education for the circuits that they are paying for, by the service providers and the districts for the Non-State Master Contract districts and by the districts for the Master State Contract districts not paid for by the Mississippi Department of Education.

The data was posted to the state E-Rate email list several times for all districts to view and correct. Several corrections were made as a result.

The METLA Committee agrees that this data is accurate and may be used to show the benefits, in Mississippi, of districts competitively bidding for services rather than simply using the SMC.

Circuit Description and Price Comparison

DISTRICTS NOT ON STATE MASTER CONTRACT

The following is a list of all districts that have broken from the State Master Contract.

These are the result of each district competitively bidding for services through the 470 process and the state required formal bid process.

The orange shaded Mb per student indicate districts that currently meet the Commission goal of 100 Mbps per 1000 students

These all include Internet access and the transport circuit.

TABLE 1 ALL DISTRICTS IN THE STATE THAT HAVE BID THEIR OWN INTERNET -- Districts Pay For Firewall and Web Filter

Dist #	District Name	Enroll	Megs	Monthly Cost	Annual cost	ISP	Cost / Mb	Mb/Stu	Cost/Stu/YR
0500	Benton County School District	1215	50	\$ 3,371.00	\$ 40,452.00	TPK	\$ 67.42	0.041	\$ 33.29
5921	Booneville School District	1260	50	\$ 300.00	\$ 3,600.00	TPK	\$ 6.00	0.040	\$ 2.86
1420	Clarksdale Municipal School District	3167	200	\$ 5,350.00	\$ 64,200.00	TPK	\$ 26.75	0.063	\$ 20.27
2521	Clinton Public School District	4698	500	\$ 5,000.00	\$ 60,000.00	TPK	\$ 10.00	0.106	\$ 12.77
1400	Coahoma County School District	1475	100	\$ 3,000.00	\$ 36,000.00	ITS	\$ 30.00	0.068	\$ 24.41
4620	Columbia School District	1771	50	\$ 3,245.00	\$ 38,940.00	TPK	\$ 64.90	0.028	\$ 21.99
0220	Corinth School District	2516	100	\$ 1,000.00	\$ 12,000.00	TPK	\$ 10.00	0.040	\$ 4.77
1700	DeSoto County School District	32635	500	\$ 5,000.00	\$ 60,000.00	TPK	\$ 10.00	0.015	\$ 1.84
3111	East Jasper School District	964	150	\$ 1,500.00	\$ 18,000.00	IN-L	\$ 10.00	0.156	\$ 18.67
1800	Forrest County Schools	2364	100	\$ 1,500.00	\$ 18,000.00	TPK	\$ 15.00	0.042	\$ 7.61
4220	Greenwood Public School District	2799	200	\$ 7,300.00	\$ 87,600.00	IN-L	\$ 36.50	0.071	\$ 31.30
1820	Hattiesburg Public School District	4643	100	\$ 95.00	\$ 1,140.00	TPK	\$ 0.95	0.022	\$ 0.25
2500	Hinds County School District	6240	150	\$ 1,992.00	\$ 23,904.00	TPK	\$ 13.28	0.024	\$ 3.83
4720	Holly Springs School District	1471	50	\$ 700.00	\$ 8,400.00	TPK	\$ 14.00	0.034	\$ 5.71
2520	Jackson Public School District	29401	1000	\$ 4,950.00	\$ 59,400.00	TPK	\$ 4.95	0.034	\$ 2.02
3700	Lamar County School District	9353	155	\$ 3,875.00	\$ 46,500.00	IN-L	\$ 25.00	0.017	\$ 4.97
3800	Lauderdale County School District	6751	200	\$ 4,000.00	\$ 48,000.00	IN-L	\$ 20.00	0.030	\$ 7.11
3900	Lawrence County School District	2157	100	\$ 900.00	\$ 10,800.00	IN-L	\$ 9.00	0.046	\$ 5.01
4100	Lee County School District	7083	100	\$ 1,500.00	\$ 18,000.00	TPK	\$ 15.00	0.014	\$ 2.54
4600	Marion County School District	2238	50	\$ 750.00	\$ 9,000.00	TPK	\$ 15.00	0.022	\$ 4.02
4700	Marshall County School District	3440	100	\$ 2,495.00	\$ 29,940.00	TPK	\$ 24.95	0.029	\$ 8.70
3820	Meridian Public School District	6117	200	\$ 970.00	\$ 11,640.00	TPK	\$ 4.85	0.033	\$ 1.90
0616	Mound Bayou Public School	547	100	\$ 2,995.00	\$ 35,940.00	IN-L	\$ 29.95	0.183	\$ 65.70
7011	North Tippah School District	1337	100	\$ 750.00	\$ 9,000.00	TPK	\$ 7.50	0.075	\$ 6.73
3022	Pascagoula Separate School District	6798	750	\$ 26,250.00	\$ 315,000.00	SLF	\$ 35.00	0.110	\$ 46.34
5500	Pearl River County School District	3028	60	\$ 480.00	\$ 5,760.00	IN-L	\$ 8.00	0.020	\$ 1.90
5600	Perry County Schools	1198	100	\$ 800.00	\$ 9,600.00	TPK	\$ 8.00	0.083	\$ 8.01
5020	Philadelphia Public School District	1214	50	\$ 400.00	\$ 4,800.00	TPK	\$ 8.00	0.041	\$ 3.95
5530	Poplarville Separate School District	1911	100	\$ 4,735.00	\$ 56,820.00	TPK	\$ 47.35	0.052	\$ 29.73
6100	Rankin County School District	19281	500	\$ 2,250.00	\$ 27,000.00	TPK	\$ 4.50	0.026	\$ 1.40
6500	Smith County School District	2800	80	\$ 4,205.00	\$ 50,460.00	TPK	\$ 52.56	0.029	\$ 18.02
5320	Starkville School District	4271	200	\$ 1,755.70	\$ 21,068.40	MC-MSU	\$ 8.78	0.047	\$ 4.93
7200	Tunica County School District	2280	100	\$ 1,995.00	\$ 23,940.00	TPK	\$ 19.95	0.044	\$ 10.50
7400	Walthall County School District	2233	100	\$ 2,795.00	\$ 33,540.00	TPK	\$ 27.95	0.045	\$ 15.02
7800	Webster County School District	1832	100	\$ 1,750.00	\$ 21,000.00	TPK	\$ 17.50	0.055	\$ 11.46
4920	Winona Separate School District	1148	100	\$ 2,500.00	\$ 30,000.00	IN-L	\$ 25.00	0.087	\$ 26.13
		Enroll	Bwidth	Monthly Cost	Annual cost		Cost / Mb	Mb/Stu	Cost/Stu/YR
		183636	6645	\$ 112,453.70	\$ 1,349,444.40		\$ 16.92	0.036	\$ 7.35

NOT ON STATE MASTER CONTRACT

The following list of districts are those who bid since the last SMC Price redetermination was done in 2011. Because these prices in part, were a reaction to the lowering of the SMC prices, we feel that it may be better suited for comparison with the SMC Prices.

TABLE 2 NEW CONTRACTS BID SINCE THE LAST CONTRACT 4000-1 PRICE RE-DETERMINATION									
Dist #	District Name	Enroll	Megs	Monthly Cost	Annual cost		Cost/Meg	Mb/Stu	Cost/Stu/YR
0500	Benton County School District	1215	50	\$ 3,371.00	\$ 40,452.00		\$ 67.42	\$ 0.041	\$ 33.29
5921	Booneville School District	1260	50	\$ 300.00	\$ 3,600.00		\$ 6.00	\$ 0.040	\$ 2.86
2521	Clinton Public School District	4698	500	\$ 5,000.00	\$ 60,000.00		\$ 10.00	\$ 0.106	\$ 12.77
0220	Corinth School District	2516	100	\$ 1,000.00	\$ 12,000.00		\$ 10.00	\$ 0.040	\$ 4.77
1700	DeSoto County School District	32635	500	\$ 5,000.00	\$ 60,000.00		\$ 10.00	\$ 0.015	\$ 1.84
3111	East Jasper School District	964	150	\$ 1,500.00	\$ 18,000.00		\$ 10.00	\$ 0.156	\$ 18.67
1800	Forrest County Schools	2364	100	\$ 1,500.00	\$ 18,000.00		\$ 15.00	\$ 0.042	\$ 7.61
2500	Hinds County School District	6240	150	\$ 1,992.00	\$ 23,904.00		\$ 13.28	\$ 0.024	\$ 3.83
4720	Holly Springs School District	1471	50	\$ 700.00	\$ 8,400.00		\$ 14.00	\$ 0.034	\$ 5.71
2520	Jackson Public School District	29401	1000	\$ 4,950.00	\$ 59,400.00		\$ 4.95	\$ 0.034	\$ 2.02
3700	Lamar County School District	9353	155	\$ 3,875.00	\$ 46,500.00		\$ 25.00	\$ 0.017	\$ 4.97
3800	Lauderdale County School District	6751	200	\$ 4,000.00	\$ 48,000.00		\$ 20.00	\$ 0.030	\$ 7.11
3900	Lawrence County School District	2157	100	\$ 900.00	\$ 10,800.00		\$ 9.00	\$ 0.046	\$ 5.01
4100	Lee County School District	7083	100	\$ 1,500.00	\$ 18,000.00		\$ 15.00	\$ 0.014	\$ 2.54
4600	Marion County School District	2238	50	\$ 750.00	\$ 9,000.00		\$ 15.00	\$ 0.022	\$ 4.02
3820	Meridian Public School District	6117	200	\$ 970.00	\$ 11,640.00		\$ 4.85	\$ 0.033	\$ 1.90
0616	Mound Bayou Public School	547	100	\$ 2,995.00	\$ 35,940.00		\$ 29.95	\$ 0.183	\$ 65.70
7011	North Tippah School District	1337	50	\$ 750.00	\$ 9,000.00		\$ 15.00	\$ 0.075	\$ 6.73
5500	Pearl River County School District	3028	60	\$ 480.00	\$ 5,760.00		\$ 8.00	\$ 0.020	\$ 1.90
5600	Perry County Schools	1198	100	\$ 800.00	\$ 9,600.00		\$ 8.00	\$ 0.083	\$ 8.01
5020	Philadelphia Public School District	1214	50	\$ 400.00	\$ 4,800.00		\$ 8.00	\$ 0.041	\$ 3.95
6100	Rankin County School District	19281	500	\$ 2,250.00	\$ 27,000.00		\$ 4.50	\$ 0.026	\$ 1.40
6500	Smith County School District	2800	80	\$ 4,205.00	\$ 50,460.00		\$ 52.56	\$ 0.029	\$ 18.02
7200	Tunica County School District	2280	100	\$ 1,995.00	\$ 23,940.00		\$ 19.95	\$ 0.044	\$ 10.50
7400	Walthall County School District	2233	100	\$ 2,795.00	\$ 33,540.00		\$ 27.95	\$ 0.045	\$ 15.02
7800	Webster County School District	1832	100	\$ 1,750.00	\$ 21,000.00		\$ 17.50	\$ 0.055	\$ 11.46
4920	Winona Separate School District	1148	100	\$ 2,500.00	\$ 30,000.00		\$ 25.00	\$ 0.087	\$ 26.13
	Enroll		Bwidth	Monthly Cost	Annual cost		Cost / Mb	Mb/Stu	Cost/Stu/YR
		153361	4795	\$ 58,228.00	\$ 698,736.00		\$ 12.14	0.031	\$ 4.56

STATE MASTER CONTRACT DISTRICTS

MIS Circuits are Metro E Circuits that connect a district straight to the Internet. Their prices dropped significantly under the last price redetermination in 2011 IF the district enters into a 3 years Service Agreement with AT&T. Districts can choose to pay for these circuits themselves or they can have the Mississippi Department of Education pay for them.

In the table, Green are districts whose circuits are paid for by The Mississippi Department of Education. Blue are those paid for by the districts.

These circuits are available in the following bandwidths. 10, 20, 50, 100, 250, 500 and 1000 Mbps

TABLE 3 DISTRICTS USING AT&T CONTRACT 4000-1 MIS CIRCUITS - Districts Pay For Firewall and Web Filter

Dist #	District Name	Enroll	Megs	Monthly Cost	Annual cost	ISP	Cost / Mb	Mb/Stu	Cost/Stu/YR
2421	Gulfport School District	5910	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.017	\$ 5.56
2400	Harrison County School District	13760	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.007	\$ 2.39
1520	Hazlehurst City School District	1520	50	\$ 1,892.55	\$ 22,710.60	AT&T	\$ 37.85	0.033	\$ 14.94
3400	Jones County School District	8432	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.012	\$ 3.90
2422	Long Beach School District	2976	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.034	\$ 11.05
4500	Madison County School District	12485	250	\$ 6,120.36	\$ 73,444.32	AT&T	\$ 24.48	0.020	\$ 5.88
4800	Monroe County School District	2268	50	\$ 1,892.55	\$ 22,710.60	AT&T	\$ 37.85	0.022	\$ 10.01
??	MS Math and Science	255	20	\$ 1,230.21	\$ 14,762.52	AT&T	\$ 61.51	0.078	\$ 57.89
5000	Neshoba County School District	3274	50	\$ 1,892.55	\$ 22,710.60	AT&T	\$ 37.85	0.015	\$ 6.94
7320	New Albany Public Schools	2162	50	\$ 1,892.55	\$ 22,710.60	AT&T	\$ 37.85	0.023	\$ 10.50
5130	Newton Municipal School	989	50	\$ 1,892.55	\$ 22,710.60	AT&T	\$ 37.85	0.051	\$ 22.96
3021	Ocean Springs School District	5578	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.018	\$ 5.90
2423	Pass Christian Public School	1865	50	\$ 1,892.55	\$ 22,710.60	AT&T	\$ 37.85	0.027	\$ 12.18
6120	Pearl Public School District	3934	50	\$ 1,892.55	\$ 22,710.60	AT&T	\$ 37.85	0.013	\$ 5.77
1212	Quitman School District	2045	20	\$ 1,330.00	\$ 15,960.00	AT&T	\$ 66.50	0.010	\$ 7.80
6200	Scott County School District	3943	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.025	\$ 8.34
7500	Vicksburg Warren School	8539	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.012	\$ 3.85
3000	Jackson County School District	9364	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.011	\$ 3.51
4000	Leake County School District	3067	100	\$ 5,190.00	\$ 62,280.00	AT&T	\$ 51.90	0.033	\$ 20.31
4400	Lowndes County School District	5034	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.020	\$ 6.53
3620	Oxford School District	3895	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.026	\$ 8.44
6920	Senatobia Municipal School District	1799	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.056	\$ 18.28
5412	South Panola School District	4538	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.022	\$ 7.25
5712	South Pike School District	1846	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.054	\$ 17.81
4120	Tupelo Public School District	7429	500	\$ 9,455.00	\$ 113,460.00	AT&T	\$ 18.91	0.067	\$ 15.27
1320	West Point School District	3243	100	\$ 2,740.35	\$ 32,884.20	AT&T	\$ 27.40	0.031	\$ 10.14
	Enroll		Bwidth	Monthly Cost	Annual cost		Cost / Mb	Mb/Stu	Cost/Stu/YR
		120150	2640	\$ 74,938.32	\$ 899,259.84		\$ 28.39	0.022	\$ 7.48

STATE MASTER CONTRACT DISTRICTS ON THE STATEWIDE NETWORK

The following is a list of districts who are on the Statewide MPLS network. The pricing for the districts shown is for transport circuit ONLY. The last row show the prices paid by the Mississippi Department of Education for the Internet component of the network. Note that the \$15.00 cost per Mbps of this bulk purchase of Internet is higher than over half of the districts who have bid in the past two years, Table 2. Those district prices include the transport circuit as well, the SMC price on the last row, does not.

The Internet circuit includes "free" Web filtering which is a factor that prevents many from bidding their own or going to the less expensive MIS Circuits on the SMC.

MPLS Circuits, according to MDE are limited to 250 Mbps. Districts needing more than that will have to change to something else. There are 29 Districts currently on MPLS that will have to switch if they are to meet the recommended 100Mbps per 1000 students. They are noted in the table in Red text. When they switch, they will have to begin paying for Web filtering and firewall even if MDE continues to pay for their MIS Circuit.

TABLE 4 DISTRICTS USING AT&T STATE CONTRACT MPLS CIRCUITS -- Firewall and Web Filter Included

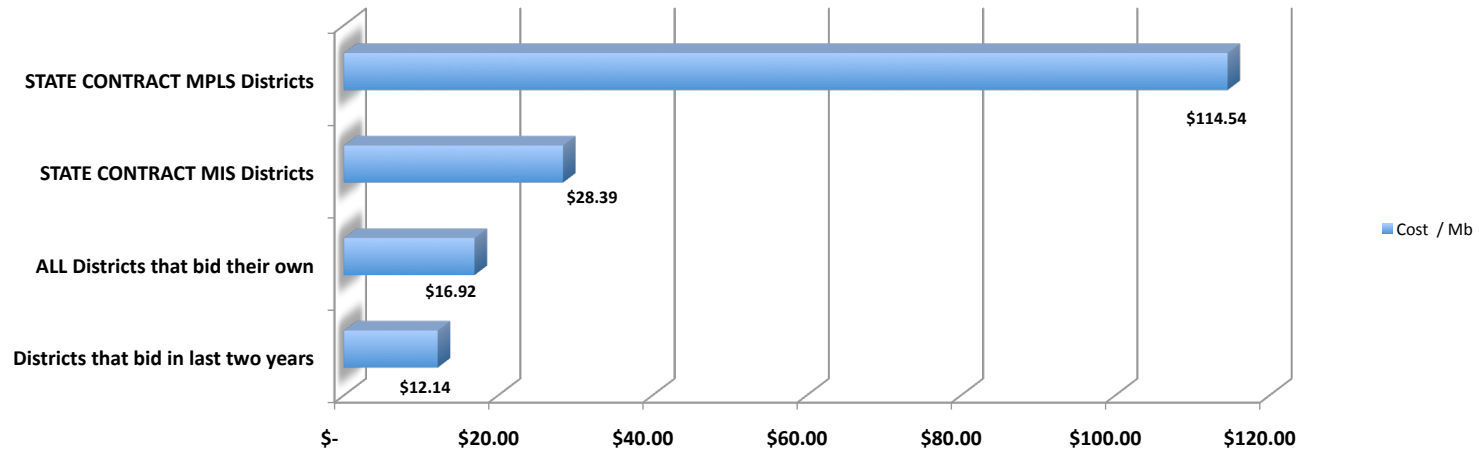
Dist #	District Name	Enroll	Megs	Monthly Cost	Annual cost	ISP	Cost / Mb	Mb/Stu	Cost/Stu/YR
4820	Aberdeen School District	1406	21	\$ 2,525.00	\$ 30,300.00	AT&T	\$ 120.24	0.015	\$ 21.55
0200	Alcorn School District	3516	100	\$ 3,690.00	\$ 44,280.00	AT&T	\$ 36.90	0.028	\$ 12.59
0300	Amite County School District	1071	15	\$ 2,425.00	\$ 29,100.00	AT&T	\$ 161.67	0.014	\$ 27.17
4821	Amory School District	1789	21	\$ 2,525.00	\$ 30,300.00	AT&T	\$ 120.24	0.012	\$ 16.94
0400	Attala County School District	1100	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.030	\$ 30.55
5920	Baldwyn School District	831	12	\$ 2,350.00	\$ 28,200.00	AT&T	\$ 195.83	0.014	\$ 33.94
2320	Bay St. Louis School District	1944	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.017	\$ 17.28
0612	Benoit School District	255	9	\$ 2,300.00	\$ 27,600.00	AT&T	\$ 255.56	0.035	\$ 108.24
2420	Biloxi Public School District	5315	100	\$ 3,690.00	\$ 44,280.00	AT&T	\$ 36.90	0.019	\$ 8.33
4320	Brookhaven School District	2869	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.012	\$ 11.71
0700	Calhoun County School District	2545	3	\$ 1,325.00	\$ 15,900.00	AT&T	\$ 441.67	0.001	\$ 6.25
4520	Canton Public School District	3325	6	\$ 1,800.00	\$ 21,600.00	AT&T	\$ 300.00	0.002	\$ 6.50
0800	Carroll County School District	989	21	\$ 2,525.00	\$ 30,300.00	AT&T	\$ 120.24	0.021	\$ 30.64
0900	Chickasaw County School District	560	9	\$ 2,300.00	\$ 27,600.00	AT&T	\$ 255.56	0.016	\$ 49.29
1000	Choctaw County School District	1520	6	\$ 1,800.00	\$ 21,600.00	AT&T	\$ 300.00	0.004	\$ 14.21
1100	Claiborne County School District	1675	15	\$ 2,425.00	\$ 29,100.00	AT&T	\$ 161.67	0.009	\$ 17.37
1300	Clay County School District	159	3	\$ 1,325.00	\$ 15,900.00	AT&T	\$ 441.67	0.019	\$ 100.00
0614	Cleveland School District	3716	21	\$ 2,525.00	\$ 30,300.00	AT&T	\$ 120.24	0.006	\$ 8.15
1402	Coahoma Co. AHS	228	3	\$ 1,325.00	\$ 15,900.00	AT&T	\$ 441.67	0.013	\$ 69.74
8111	Coffeeville School District	591	10	\$ 1,283.00	\$ 15,396.00	AT&T	\$ 128.30	0.017	\$ 26.05
4420	Columbus Municipal School District	4560	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.007	\$ 7.37
1500	Copiah County School District	3816	21	\$ 2,525.00	\$ 30,300.00	AT&T	\$ 120.24	0.006	\$ 7.94
1600	Covington County School District	2996	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.011	\$ 11.21
??	Drew School District	579	3	\$ 1,325.00	\$ 15,900.00	AT&T	\$ 441.67	0.005	\$ 27.46
2620	Durant Public School District	561	12	\$ 2,350.00	\$ 28,200.00	AT&T	\$ 195.83	0.021	\$ 50.27
6811	East Tallahatchie School District	1276	9	\$ 2,300.00	\$ 27,600.00	AT&T	\$ 255.56	0.007	\$ 21.63
1211	Enterprise School District	991	9	\$ 2,300.00	\$ 27,600.00	AT&T	\$ 255.56	0.009	\$ 27.85
6220	Forest Municipal School District	1506	20	\$ 2,060.00	\$ 24,720.00	AT&T	\$ 103.00	0.013	\$ 16.41
1802	Forrest County AHS	567	6	\$ 1,800.00	\$ 21,600.00	AT&T	\$ 300.00	0.011	\$ 38.10
1900	Franklin County School District	1484	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.022	\$ 22.64
2000	George County School District	4057	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.008	\$ 8.28
2100	Greene County School District	2100	50	\$ 3,060.00	\$ 36,720.00	AT&T	\$ 61.20	0.024	\$ 17.49
7620	Greenville Public School District	5698	100	\$ 3,690.00	\$ 44,280.00	AT&T	\$ 36.90	0.018	\$ 7.77
2220	Grenada School District	4296	100	\$ 3,690.00	\$ 44,280.00	AT&T	\$ 36.90	0.023	\$ 10.31
2300	Hancock County School District	4433	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.007	\$ 7.58
7611	Hollandale School District	675	15	\$ 2,425.00	\$ 29,100.00	AT&T	\$ 161.67	0.022	\$ 43.11
2600	Holmes County School District	3021	45	\$ 3,300.00	\$ 39,600.00	AT&T	\$ 73.33	0.015	\$ 13.11
0920	Houston School District	1769	12	\$ 2,350.00	\$ 28,200.00	AT&T	\$ 195.83	0.007	\$ 15.94
2700	Humphreys County School District	1764	50	\$ 3,060.00	\$ 36,720.00	AT&T	\$ 61.20	0.028	\$ 20.82
6721	Indianola School District	2158	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.015	\$ 15.57
2900	Itawamba County School District	3479	6	\$ 1,800.00	\$ 21,600.00	AT&T	\$ 300.00	0.002	\$ 6.21
3200	Jefferson County School District	1371	3	\$ 1,325.00	\$ 15,900.00	AT&T	\$ 441.67	0.002	\$ 11.60
3300	Jefferson Davis County School District	1636	33	\$ 2,800.00	\$ 33,600.00	AT&T	\$ 84.85	0.020	\$ 20.54
3500	Kemper County School District	1161	9	\$ 2,300.00	\$ 27,600.00	AT&T	\$ 255.56	0.008	\$ 23.77
0420	Kosciusko School District	2359	6	\$ 1,800.00	\$ 21,600.00	AT&T	\$ 300.00	0.003	\$ 9.16
3600	Lafayette County School District	2561	21	\$ 2,525.00	\$ 30,300.00	AT&T	\$ 120.24	0.008	\$ 11.83
3420	Laurel School District	3045	6	\$ 1,800.00	\$ 21,600.00	AT&T	\$ 300.00	0.002	\$ 7.09

4200	Leflore County School District	2808	21	\$	2,525.00	\$	30,300.00	AT&T	\$	120.24	0.007	\$	10.79
7612	Leland School District	972	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.012	\$	29.01
4300	Lincoln County School District	3074	21	\$	2,525.00	\$	30,300.00	AT&T	\$	120.24	0.007	\$	9.86
8020	Louisville Municipal School District	2841	9	\$	2,300.00	\$	27,600.00	AT&T	\$	255.56	0.003	\$	9.71
3711	Lumberton Public School District	639	21	\$	2,525.00	\$	30,300.00	AT&T	\$	120.24	0.033	\$	47.42
5720	McComb School District	2726	45	\$	3,300.00	\$	39,600.00	AT&T	\$	73.33	0.017	\$	14.53
4900	Montgomery County School District	290	20	\$	2,060.00	\$	24,720.00	AT&T	\$	103.00	0.069	\$	85.24
3020	Moss Point School District	2370	45	\$	3,300.00	\$	39,600.00	AT&T	\$	73.33	0.019	\$	16.71
??	MS School of the Arts	111	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.108	\$	254.05
0130	Natchez-Adams School District	3762	50	\$	3,060.00	\$	36,720.00	AT&T	\$	61.20	0.013	\$	9.76
4111	Nettleton School District	1340	15	\$	2,425.00	\$	29,100.00	AT&T	\$	161.67	0.011	\$	21.72
5100	Newton County School District	1821	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.007	\$	15.49
0613	North Bolivar School District	646	3	\$	1,325.00	\$	15,900.00	AT&T	\$	441.67	0.005	\$	24.61
5411	North Panola School District	1555	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.008	\$	18.14
5711	North Pike School District	2401	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.005	\$	11.75
5200	Noxubee County School District	1785	15	\$	2,425.00	\$	29,100.00	AT&T	\$	161.67	0.008	\$	16.30
0921	Okolona Separate School District	667	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.018	\$	42.28
5300	Oktibbeha County School District	879	6	\$	1,800.00	\$	21,600.00	AT&T	\$	300.00	0.007	\$	24.57
1821	Petal School District	3940	45	\$	3,300.00	\$	39,600.00	AT&T	\$	73.33	0.011	\$	10.05
5520	Picayune School District	3627	45	\$	3,300.00	\$	39,600.00	AT&T	\$	73.33	0.012	\$	10.92
5820	Pontotoc City Schools	2309	50	\$	3,060.00	\$	36,720.00	AT&T	\$	61.20	0.022	\$	15.90
5800	Pontotoc County Schools	3472	45	\$	3,300.00	\$	39,600.00	AT&T	\$	73.33	0.013	\$	11.41
5900	Prentiss County School District	2382	3	\$	1,325.00	\$	15,900.00	AT&T	\$	441.67	0.001	\$	6.68
6000	Quitman County School District	1223	3	\$	1,325.00	\$	15,900.00	AT&T	\$	441.67	0.002	\$	13.00
5620	Richton School District	713	9	\$	2,300.00	\$	27,600.00	AT&T	\$	255.56	0.013	\$	38.71
0615	Shaw School District	491	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.024	\$	57.43
6400	Simpson County School District	4150	100	\$	3,690.00	\$	44,280.00	AT&T	\$	36.90	0.024	\$	10.67
6312	South Delta School District	913	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.013	\$	30.89
7012	South Tippah School District	2827	20	\$	2,060.00	\$	24,720.00	AT&T	\$	103.00	0.007	\$	8.74
6600	Stone County School District	2691	50	\$	3,060.00	\$	36,720.00	AT&T	\$	61.20	0.019	\$	13.65
6700	Sunflower County School District	2057	100	\$	3,690.00	\$	44,280.00	AT&T	\$	36.90	0.049	\$	21.53
6900	Tate County School District	2933	21	\$	2,525.00	\$	30,300.00	AT&T	\$	120.24	0.007	\$	10.33
7100	Tishomingo County Schools	3184	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.004	\$	8.86
7300	Union County School District	2773	33	\$	2,800.00	\$	33,600.00	AT&T	\$	84.85	0.012	\$	12.12
5131	Union Public School District	1029	12	\$	2,350.00	\$	28,200.00	AT&T	\$	195.83	0.012	\$	27.41
8113	Water Valley School District	1224	9	\$	2,300.00	\$	27,600.00	AT&T	\$	255.56	0.007	\$	22.55
7700	Wayne County School District	3535	33	\$	2,800.00	\$	33,600.00	AT&T	\$	84.85	0.009	\$	9.50
0611	West Bolivar School District	786	3	\$	1,325.00	\$	15,900.00	AT&T	\$	441.67	0.004	\$	20.23
3112	West Jasper School District	1469	20	\$	2,060.00	\$	24,720.00	AT&T	\$	103.00	0.014	\$	16.83
6812	West Tallahatchie School	785	9	\$	2,300.00	\$	27,600.00	AT&T	\$	255.56	0.011	\$	35.16
7613	Western Line School District	2022	6	\$	1,800.00	\$	21,600.00	AT&T	\$	300.00	0.003	\$	10.68
7900	Wilkinson County School District	1298	9	\$	2,300.00	\$	27,600.00	AT&T	\$	255.56	0.007	\$	21.26
8220	Yazoo City Municipal School District	2523	33	\$	2,800.00	\$	33,600.00	AT&T	\$	84.85	0.013	\$	13.32
8200	Yazoo County School District	1719	6	\$	1,800.00	\$	21,600.00	AT&T	\$	300.00	0.003	\$	12.57
	Jackson Region Core			\$	5,616.00	\$	67,392.00	AT&T					
	MDE - Internet 2GB@\$15			\$	30,000.00	\$	360,000.00	AT&T					
		Enroll	Bwidth	Monthly Cost	Annual cost		Cost / Mb	Mb/Stu	Cost/Stu/YR				
		186085	2251	\$ 257,829.00	\$ 3,093,948.00		\$ 114.54	0.012	\$ 16.63				

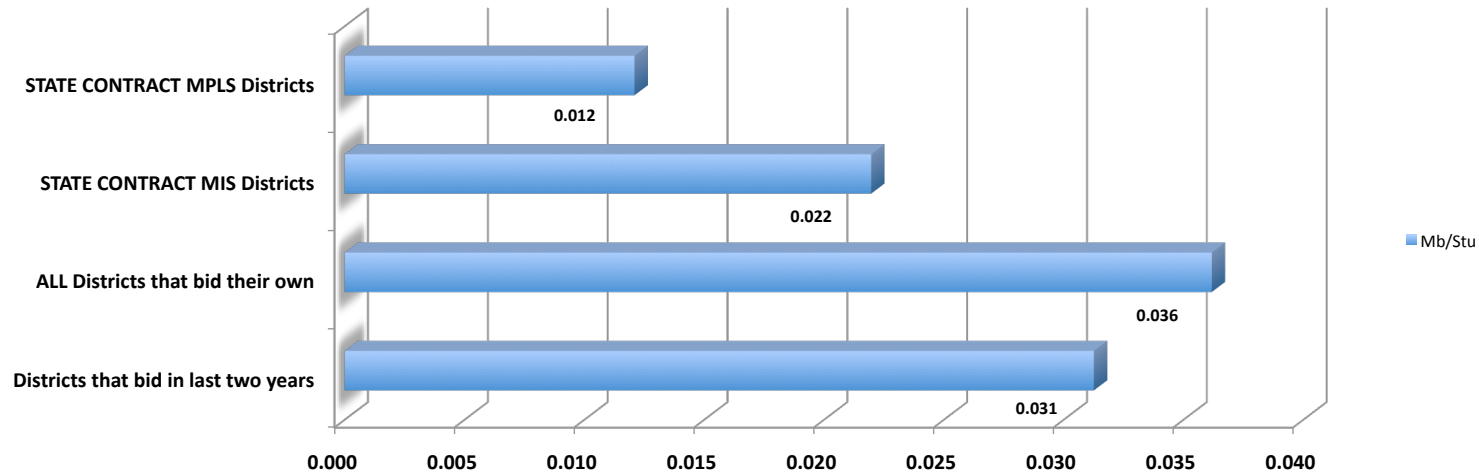
Attachment B

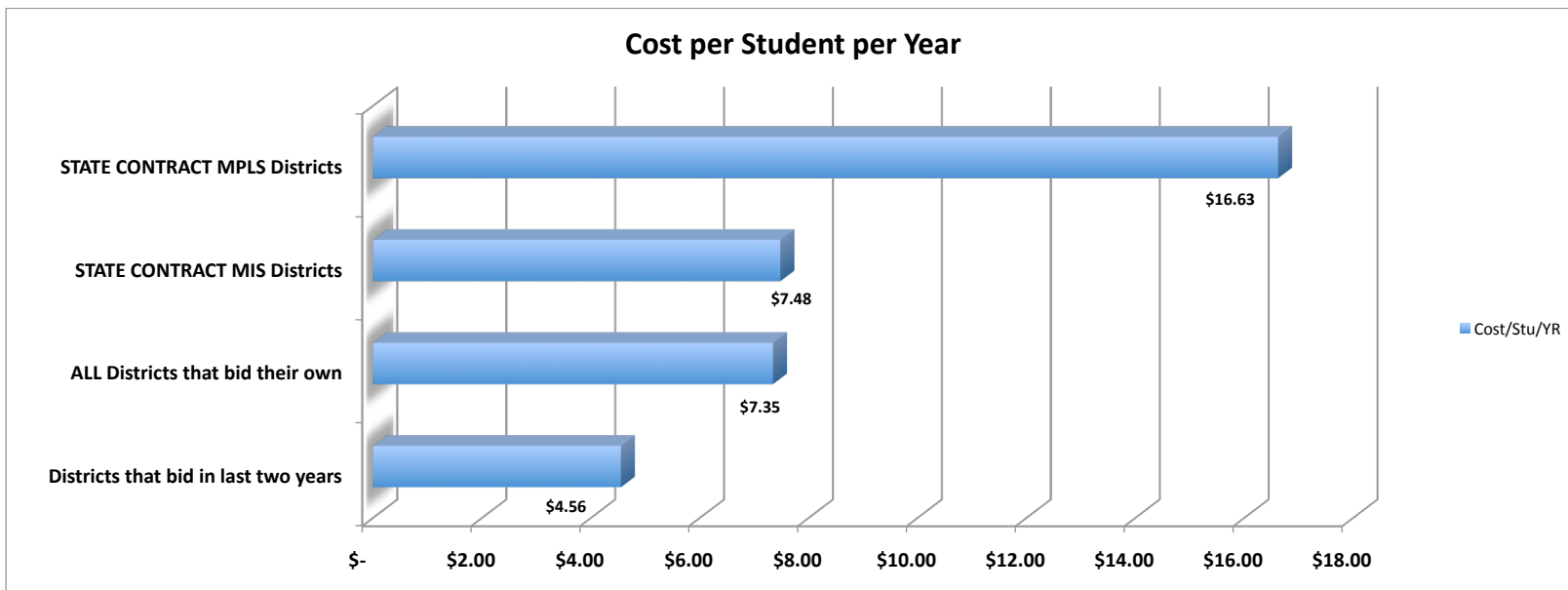
The following two pages are three bar graphs illustrating the data contained in Attachment A.

Cost Per Megabit of Bandwidth



Bandwidth (Megabits) Per Student





SUMMARY

Districts who have bid in the past two years pay 64% LESS money per student than the state contract MIS districts but provide students with 42% MORE bandwidth.

When considering ALL districts who have bid their own, the cost per student per year is 6% HIGHER than State Contract MIS Districts but that 6% buys 64% more bandwidth per student than State Contract MIS districts.